

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 22-11068 (KBO)
)
) (Jointly Administered)
)
) Related to Docket Nos. 1693 and 29773
)
)
)
)

**CERTIFICATION OF COUNSEL REGARDING
REVISED ORDER GRANTING DO KWON'S MOTION
TO ENFORCE ORDER GRANTING MOTION OF PYTH DATA
ASSOCIATION FOR RELIEF FROM THE AUTOMATIC STAY (ECF 1693)**

The undersigned hereby certifies as follows:

1. On February 27, 2025, counsel to Do Kwon (“**Kwon**”) filed a *Motion to Enforce Order Granting Motion of Pyth Data Association for Relief from the Automatic Stay* [Docket No. 29773] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). On February 28, 2025, the plan administrator (the “**Terraform Plan Administrator**”) of the jointly-administered estates of Terraform Labs Pte. Ltd. (“**Terraform**”), *et al.* (Bankr. D. Del., Case No. 24-10070), filed the *Terraform Plan Administrator’s Joinder to Do Hyeong Kwon’s Motion to Enforce Order Granting Motion of Pyth Data Association for Relief from the Automatic Stay* [Docket No. 29808] (the “**Joinder**”). Attached to the Motion as Exhibit A was a proposed form of order granting the relief requested in the Motion (the “**Proposed Order**”).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

2. Pursuant to the notice of hearing on the Motion that was attached to the Motion, objections or responses to the Motion, if any, were to be made in writing and filed with the Court on or before March 6, 2025, at 4:00 p.m. (prevailing Eastern Time) (the “**Objection Deadline**”). Prior to the Objection Deadline, objections to the relief in the Motion were filed by (i) the FTX Recovery Trust (“**FTX**”) at Docket No. 30052 and (ii) the Pyth Data Association (“**PDA**”) at Docket No. 30053.

3. On April 17, 2025, the Court held a hearing (the “**Hearing**”) to consider entry of the proposed order. Consistent with the record made at the Hearing, Kwon, the Terraform Plan Administrator, and PDA (together, the “**Parties**”) submit this revised proposed order (the “**Revised Proposed Order**”). In addition, consistent with the record made at the Hearing, the Parties have agreed to the Token Delivery Agreement attached to the Revised Proposed Order as Exhibit 1.

4. A copy of the Revised Proposed Order is attached hereto as Exhibit A. For the convenience of the Court and all parties in interest, a blackline comparison of the Revised Proposed Order marked against the Proposed Order is attached hereto as Exhibit B.

WHEREFORE, the Parties respectfully request that the Revised Proposed Order, substantially in the form attached hereto as Exhibit A, be entered at the earliest convenience of the Court.

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Dated: May 1, 2025
Wilmington, Delaware

/s/ Michael Busenkell

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